

Crotty, J

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

MICHAEL R. BALBOA and  
GILLES T. DE CHARSONVILLE,

Defendants.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 2-17-12

11 Civ. 8731 (PAC)

**STIPULATION AND  
~~PROPOSED~~ ORDER  
REGARDING TIME TO  
RESPOND TO COMPLAINT**

WHEREAS, plaintiff Securities and Exchange Commission ("Plaintiff") commenced this action by filing a complaint on December 1, 2011 (the "Complaint");

WHEREAS, on December 21, 2011, counsel for defendant Gilles de Charsonville ("Charsonville") accepted service of the Complaint on behalf of Charsonville;

WHEREAS, on December 23, 2011, counsel for Plaintiff and Charsonville entered into a stipulation by which they agreed that Charsonville's time to move, answer or otherwise respond to the Complaint would be adjourned until January 23, 2012, which stipulation was "so ordered" by the Court on December 29, 2011;

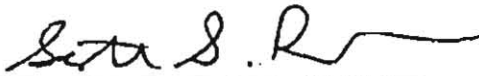
WHEREAS, on January 19, 2012, counsel for Plaintiff and Charsonville entered into a stipulation by which they agreed that Charsonville's time to move, answer or otherwise respond to the Complaint would be adjourned until February 23, 2012, which stipulation was "so ordered" by the Court on January 20, 2012;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiff and for defendant Charsonville below, that the time by which Defendant Charsonville may move, answer, or otherwise respond to the Complaint shall be up to, and including, March 15, 2012. Defendant Charsonville reserves all rights and defenses he may have in this action, and entry into this stipulation shall not impair or otherwise affect any such rights, objections and defenses.

Dated: New York, New York  
February 14, 2012

CHADBOURNE & PARKE LLP

By



Scott S. Balber

A Member of the Firm

Attorneys for Gilles de Charsonville

30 Rockefeller Plaza

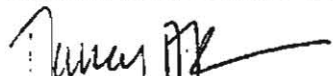
New York, New York 10112

(212) 408 5466

sbalber@chadbourne.com

SECURITIES & EXCHANGE COMMISSION

By



George S. Canellos

Nancy A. Brown

Attorneys for Plaintiff

New York Regional Office

3 World Financial Center, Room 400

New York, New York 10281

(212) 336-1023 (Brown)

brown@sec.gov

SO ORDERED:

2-17-12  
  
HON. PAULA A. CROTTY  
UNITED STATES DISTRICT JUDGE